

Remarks

This Application has been carefully reviewed in light of the final Office Action mailed July 20, 2009. Applicant appreciates the Examiner's consideration of the Application. Claims 1-35 are pending in the application. Applicants amend Claims 1-6, 25-27, 29-31, and 34-35. The Examiner rejects Claims 1-35. To advance prosecution of this case, Applicant respectfully requests consideration and allowance of all pending claims.

Section 102 and 103 Rejections

The Examiner rejects under 35 U.S.C. § 102(e): Claims 1-6, 25-31, and 33-35 as being anticipated by U.S. Patent Application Publication No. 2003/0233439 filed by Stone ("*Stone*"). The Examiner rejects under 35 U.S.C. § 103(a): Claims 7-12, 17-19, and 32 over *Stone* in view of U.S. Patent Application Publication No. 2002/0040389 filed by Gerba ("*Gerba*"); and Claims 20-24 over *Stone* in view of U.S. Patent No. 5,941,947 issued to Brown ("*Brown*").

Applicant respectfully submits that the cited portions *Stone* fails to disclose elements specifically recited in Applicant's claims. For example, the cited portions of *Stone* do not disclose the following limitations recited in amended, independent Claim 1:

a grouping unit, associated with said discovery unit, configured to use said discovered patterns to form at least one group from said user nodes or said resource nodes using said discovered patterns, such that:

users or resources having all or a subset of at least two links to common resources or users are automatically determined to be placed into a same group, and

the users or resources of the at least one group did not exist as a group prior to the discovery unit searching for patterns within the links[.]

The Examiner cited to ¶¶ 56-57, 59, 60-61, 63, 77, 89, and 93-95 of *Stone* in rejecting a previous version of Claim 1. Office Action, page 3. At ¶ 94, *Stone* recites:

The administrator may assign attribute values to the group attributes and then save the group as a template. The template can be used to form new groups that have similar attribute values to a selected template that is stored by the central administration tool. Accordingly, in at least some situations the user may save time in administering groups by retrieving templates and making only slight modifications to establish new user groups.

That is, this portion of *Stone* discloses forming a group based on manually added attributes: “The administrator may assign attribute values to the group attributes and then save the group as a template.” In addition, *Stone* discloses that these group templates may be used to form other groups by manually revising the template: “the user may save time in administering groups by retrieving templates and making only slight modifications to establish new user groups.” As a result, the cited portions of *Stone* discloses forming new groups using templates includes manually changing the members of the group and/or keeping the members of the group the same but manually changing the attributes of the group. In contrast, the claim recites “users or resources having all or a subset of at least two links to common resources or users are automatically determined to be placed into a same group,” (emphasis supplied), which is not disclosed by *Stone*’s disclosure of manually changing members of the group. In addition, the claim recites “the users or resources of the at least one group did not exist as a group prior to the discovery unit searching for patterns within the links,” (emphasis supplied), which is not disclosed by *Stone*’s disclosure of keeping the members of the group stored in the template as the members of the newly formed group using the template. For analogous reasons, Claims 25-27, 29-31, and 34-35 are also not disclosed by the cited portions of *Stone*.

As another example, the cited portions of *Stone* do not disclose, teach, or suggest the following limitations recited in amended, dependent Claim 3: “wherein said links comprise usage levels of respective resources by respective users.” In rejecting this claim, the Final Office Action cited to ¶ 97 of *Stone*. Page 4. There, *Stone* discloses a central administration tool to “manage one or more resources” and that “supports user maintenance, group maintenance and is customizable to interact with one or more applications.” That is, the cited portions of *Stone* merely disclose a tool that may be used to administer users, resources, and groups. The cited portions of *Stone* do not disclose “usage levels” much less “wherein said links comprise usage levels of respective resources by respective users.”

As another example, the cited portions of the proposed *Stone-Gerba* combination do not disclose, teach, or suggest all of the following limitations, *inter alia*, recited in dependent Claim 7: “and iteratively to add resources and remove users not having a predefined relationship with said iteratively added resources, to meet a resource number, or a user number constraint.” In rejecting this claim, the Final Office Action cited to ¶¶ 54, 81, and 102 of *Gerba*. Page 8. The cited portions of *Gerba* disclose client management, content

management, and script management where managing such items includes adding, deleting, or modifying such items. ¶ 54. The cited portions of *Gerba* also disclose a network structure tree and a network structure database such that “[h]aving a network structure database allows the node to store the last used tree and to make periodic updates to quickly rebuild the network structure tree if required.” ¶ 81. In addition, the cited portions of *Gerba* searching across a network tree for file and determining the locations on the tree where the file exists. ¶ 102. That is, the cited portions of *Gerba* merely disclose management of clients, content, and scripts as well as a network structure tree that may be used to locate files. The cited portions of *Gerba* do not disclose, teach, or suggest that the management of clients, content, and scripts is accomplished using the network tree, much less a tree that is able to iteratively “add resources and remove users not having a predefined relationship with said iteratively added resources, to meet a resource number, or a user number constraint,” as required in Claim 7. For analogous reasons, the cited portions of the proposed *Stone-Gerba* combination do not disclose, teach, or suggest all of the following limitations recited in dependent Claim 17.

In addition to the reasons discussed above with respect to Claim 7, the cited portions of the proposed *Stone-Gerba* combination do not disclose, teach, or suggest all of the following limitations recited in dependent Claim 8: “wherein said search engine is operable to use a homogeneity measure to determine whether to consider a candidate grouping in said search.” In rejecting this claim, the Final Office Action cited to ¶ 56 of *Gerba*, where it is disclosed that content loops, which may be played on clients, may be:

homogenous within a local network such as the clients corresponding to the northernmost access point 32 in California, or can be heterogeneous and show different content on client units such as content loops Y and Z shown connected to the westernmost access point 32 in New York.

Page 9. That is, the cited portions of *Gerba* merely disclose that the same content may be played on multiple clients (homogenous) and that different content may be played on the clients. This does not disclose, nor teach or suggest, a “search engine” that is “operable to use a homogeneity measure” much less using the homogeneity measure “to determine whether to consider a candidate grouping in said search,” as recited in dependent Claim 8. The cited portions of the proposed *Stone-Gerba* combination also fail to disclose, teach, or suggest all of the limitations of Claim 9 for analogous reasons.

As yet another example, the cited portions of the proposed *Stone-Brown* combination do not disclose, teach, or suggest all of the following limitations, *inter alia*, recited in

dependent Claim 22: “wherein said discovery unit is further operable to perform groupings on each of the subgraphs, and then to merge the results into a full graph.” In rejecting this claim, the Final Office Action cited to col. 12, l. 51 - col. 13, l. 38 of *Brown*. Page 10. There, *Brown* discloses hierarchical directory structures in the form of directed acyclic graphs. col. 12, ll. 51-52. The graphs contain leaves, folders, and junction points. *Brown*, Col. 12, l. 67. “Leaves normally represent the actual services within network 100.” *Id.* at col. 13, ll. 6-7. “Folder nodes normally represent collections ... and are used to organize the content of the network.” *Id.* at col. 13, ll. 18-20. “Junction point nodes serve as proxies for nodes in other ... namespaces, and are used to allow the user to seamlessly traverse between namespaces.” *Id.* at col. 13, ll. 30-33. That is, the cited portions of *Brown* disclose how a network may be traversed by a user when it is organized as an acyclic graph. This does not disclose, teach, or suggest performing “groupings on each of the subgraphs, and then to merge the results into a full graph,” as recited in Claim 22. For analogous reasons, the cited portions of the proposed *Stone-Brown* combination do not disclose, teach, or suggest all of the limitations recited in dependent Claim 23.

For at least these reasons, Claims 1-27 and 29-35 are allowable under 35 U.S.C. §§ 102 and 103. Favorable action is requested.

CONCLUSION

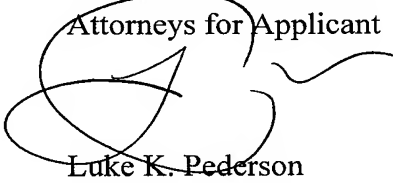
Applicant has made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other apparent reasons, Applicant respectfully requests full allowance of all pending claims.

Applicant believes that no fees are due. However, the Examiner is hereby authorized to charge any fee or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

If the Examiner believes a telephone conference would advance prosecution of this case in any way, the Examiner is invited to contact Luke K. Pedersen, Attorney for Applicant, at the Examiner's convenience at (214) 953-6655.

Respectfully submitted,

~~BAKER BOTTS L.L.P.~~
Attorneys for Applicant



Luke K. Pederson
Reg. No. 45,003

Date: October 20, 2009

Correspondence Address:

Customer Number: **05073**